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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

SKYWEST PILOTS ALPA ORGANIZING )  
COMMITTEE, *et al.*, )  
Plaintiffs, )  
vs. )  
SKYWEST AIRLINES, INC., )  
Defendant. )

CASE No. C-07-2688 CRB

**PLAINTIFFS' MOTION TO  
REQUIRE SKYWEST TO PROVIDE  
WITNESS LIST**

By necessity, the preliminary injunction trial in this matter has been set on an expedited schedule and will require a great amount of work by the parties in short order. Further, it is in all parties' interest, as well as the Court's, that the testimony be completed in one day. It is therefore self-evident that the parties should cooperate in exchanging information that will help make the process as orderly and efficient as possible.

At the very least, the parties need to exchange witness lists so that they can prepare efficiently for and thus expedite cross-examination at trial. But although Plaintiffs provided Defendant with their complete witness list and subject of testimony on May 25, 2007, SkyWest has

1 refused to reciprocate. Plaintiffs therefore respectfully request that the Court order SkyWest to  
 2 provide Plaintiffs with a witness list, including a description of the subject of each witness'  
 3 testimony. Due to the expedited nature of the proceeding, Plaintiffs further respectfully request that  
 4 SkyWest be given one business day to do so.

5 By way of background, on May 24, 2007, the Court ordered Plaintiffs to designate five pilot  
 6 witnesses for whom it needed SkyWest's cooperation in releasing them from duty. *See* Declaration  
 7 of Linda Lye in Support of Plaintiffs' Motion to Require SkyWest to Provide Witness List, Ex. 1.  
 8 On May 25, 2007, Plaintiffs complied. *Id.*, Ex. 2. But Plaintiffs voluntarily went beyond the  
 9 Court's order, and identified all of their witnesses, as well as the subject matter of the testimony of  
 10 all witnesses. *Id.* Plaintiffs requested that SkyWest reciprocate both in their letter and in follow up  
 11 e-mail correspondence. *Id.*, Exs. 2, 3. SkyWest has not responded. *Id.*, ¶5.

12 Having taken steps voluntarily to assist the parties in preparing for the preliminary injunction  
 13 trial, Plaintiffs are faced with a Defendant that apparently believes seeking every conceivable  
 14 tactical advantage is better than assisting in an orderly, efficient process. Accordingly, Plaintiffs  
 15 respectfully request that the Court order SkyWest to provide Plaintiffs with a witness list and the  
 16 subject matter of each witness' testimony by 10 am on Monday, June 4.

17 Dated: June 1, 2007

Respectfully submitted

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